

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of:	)	CC Docket 05-337
	)	
High – Cost Universal Service Support	)	CC Docket 96-45
	)	
	)	
Federal – State Joint Board on	)	
Universal Service	)	
	)	
	)	

**COMMENTS OF THE IOWA UTILITIES BOARD**

The Iowa Utilities Board (IUB) submits these comments regarding the Notice of

Proposed Rulemaking inviting comments for its review of the Recommended Decision

of the Federal – State Joint Board (Joint Board) on Universal Service, which

recommended that the Federal Communications Commission address the long term

reform issues facing the high-cost universal support system and make fundamental

revisions in the structure of existing Universal Service mechanisms.

The IUB supports the Joint Board Recommended Decision and further encourages the

FCC to move forward with a comprehensive reform plan. While the IUB is supportive of

the establishment of the three separate funds recommended by the Joint Board, the IUB

wishes to express its concern over the cost that would be incurred by the states. The

Recommended Decision does not address how funding would be provided to the states

for such activities as: determining “unserved” areas; conducting auctions; determining

who would receive the proposed grants; and auditing grant recipients. Currently, IUB

Staff has full time assignments to cover its existing functions, and it appears additional staff could be required if these become “state functions”. The IUB believes

that the FCC should address these concerns. One other issue not addressed by the

Recommended Decision is how a wireline –based Competitive local exchange carrier

who has been approved as an eligible telecommunications carrier, currently receiving

high – cost universal service support will be treated. The IUB believes that issue should

also made clear since this issue would affect more than thirty (30) companies in Iowa.

## CONCLUSION

The Iowa Utilities Board respectfully submits these comments for the FCC’s consideration regarding its review of the Joint Board’s Recommended Decision.

submitted, Respectfully

---

Dennis Rosauer

Utility Specialist

April 17, 2008